

May 13, 2022

VIA ECF

Honorable Analisa Torres
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *In re Search Warrant dated November 5, 2021*,
Case No. 21-MC-00813 (AT)



National Office
125 Broad Street, 18th floor
New York NY 10004
(212) 549-2500
aclu.org

Dear Judge Torres,

The American Civil Liberties Union (“ACLU”) respectfully moves for leave to file the accompanying *amicus curiae* letter in support of Intervenor Reporters Committee for Freedom of the Press’s Objections, ECF No. 49, to Magistrate Judge Cave’s Opinion and Order of December 7, 2021, ECF No. 47.

The ACLU is a nationwide, nonprofit, nonpartisan organization dedicated to the principles of liberty and equality embodied in the Constitution and our nation’s civil rights laws. The ACLU frequently appears in courts throughout the countries, as counsel to parties or as *amicus*, to defend the public right of access to court proceedings and filings. The proper resolution of the motion to unseal in this case is a matter of substantial interest to the ACLU and its members.

Intervenor Reporters Committee for Freedom of the Press consents to this motion. Project Veritas and James O’Keefe do not object to this motion. The Government does not object to this motion, but requests the opportunity to submit a response, if needed, within 30 days of the filing of the ACLU’s *amicus curiae* letter. The ACLU consents to the Government’s request.

We appreciate the Court's attention to this matter.

Respectfully submitted,

/s/ Brian Hauss

Brian Hauss

Brett Max Kaufman

American Civil Liberties

Union Foundation

125 Broad Street, 18th Floor

New York, New York 10004

(212) 549-2500

bhauss@aclu.org

bkaufman@aclu.org

Counsel for Proposed Amicus Curiae



CC: All Counsel of Record (ECF)